



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

FEB 20 2013

VIA E-MAIL

Scott E. Enright
Deputy to the Chairperson
Hawaii Department of Agriculture
1428 South King Street
Honolulu, HI 96814

Dear Mr. Enright:

Enclosed is the Draft End-of-Year Evaluation Report of the FY12 Pesticide Performance Partnership Grant between the Hawaii Department of Agriculture (HDA) and the U.S. Environmental Protection Agency (EPA), Region 9.

The End-of-Year Report is based on the reports and documents that HDA provided to EPA as well as an on-site visit in November, 2012. Our review found that HDA continues to maintain a quality program and the Pesticide Program met all major outputs and projections for FY12. Inspection projections were exceeded, and several large-scale projects were completed, such as the Branch and Laboratory Standard Operating Procedures, and the Pesticide Quality Assurance Project Plan which was drafted and forwarded to EPA. Additional programmatic findings are located within the body of the report.

Please review the enclosed report and provide any comments or additions to Mary Grisier within 30 days. If no comments are received, the report will be considered final.

Sincerely,

A handwritten signature in cursive script, reading "Pamela Cooper", is written over a light blue horizontal line.

Pamela Cooper, Manager
Pesticides Office

Enclosure

Cc: Thomas Matsuda, HDA
Dean Yoshizu, HDA
Vernese Gholson, (MTS-7)
Mary Grisier, (CED-5)

U.S. Environmental Protection Agency
Hawaii Department of Agriculture
FY2012 End-of-Year Review

Pesticide Performance Partnership Grant

Executive Summary- This report covers workplan activities conducted in FY12, and is based on discussions and review of documents throughout the year and during the end of year visit. Discussions were held during the end of year visit that focused on recent changes to the pesticide program at Hawaii Department of Agriculture (HDA). Recommendations for improvements to inspection procedures can be found within the body of this report. This report covers the first year of a two-year performance partnership grant between Hawaii Department of Agriculture and EPA Region 9. This grant was put into place to ease administrative burdens on HDA and to allow for more long-term planning for the Pesticide program. Databases that track certified applicator education and licensing are in need of updating and integration. FY14 negotiations should include discussions of how this might be accomplished.

I. BACKGROUND

A. General

- 1. Project Period:** October 1, 2011 – September 30, 2012.
- 2. EPA Assistance Agreement Number:** #BGOOT64412
- 3. Review method:** On-site

- 4. Review participants:**

EPA: Mary Grisier, Hawaii Pesticide Project Officer
Grantee: Thomas Matsuda, Pesticide Program Manager, Avis Onaga, Case Preparation Officer, and Dean Yoshizu, Compliance Officer

- 5. Review date(s) and location:** November 8-10, 2012 at the Hawaii Department of Agriculture offices in Honolulu.

B. Scope of Review

The Hawaii Department of Agriculture (HDA) has partial primary enforcement responsibility over pesticide use activities in the State of Hawaii and is the lead state agency for the enforcement of the Hawaii Pesticides Law (Chapter 149A, Hawaii Revised Statutes) and the Hawaii Administrative Rules (Chapter 66, Title 4). There are approximately 1,110,000 acres in farmland, 7,500 farms, 6,400 agricultural workers, 3,800 Agricultural Operators, 1,200 certified applicators, 21 licensed Restricted Use Pesticide (RUP) dealers, 18 pesticide producing establishments, and four licensed aerial applicators in the state of Hawaii. Major crops in Hawaii include seed corn, coffee, papaya, bananas and nursery plants. Average farm size in Hawaii is 150 acres. HDA maintains a database of all pesticides licensed in Hawaii. The HDA Pesticide program consists of approximately 14 individuals over 4 islands performing inspection, education, registration, administrative, and other pesticide program activities.

The Hawaii Pesticide program is supported by both State (general and revolving) and federal (USDA and USEPA) funds. HDA and USEPA Region 9 had one active Performance Partnership Grant (PPG) with pesticide related activities to be carried out in Federal Fiscal Year 2012. The purpose of the PPG is to reduce paperwork and provide administrative relief and flexibility to HDA.

The FY12 end-of-year evaluation was primarily accomplished by reviewing quarterly reports and correspondence received from HDA throughout the year, and an on-site visit by Mary Grisier, project officer for HDA. Information gathered was compared to the outputs and standards in the cooperative agreements to determine if HDA had met its commitments.

II. FINANCIAL

A. Budget Analysis

The following table summarizes funding and expenditures for the FY12 cooperative agreement. In FY12, approximately three FTE were supported by EPA funding (Inspector, Pesticide Specialist, and Chemist).

At the time of this writing, final Financial Status Reports (FSRs) for FY12 were not due and had not been received.

Work Plan Component	EPA Funding	Grantee Funding*	Total Funding
Enforcement	\$197,000	\$35,055	\$232,055
Programs	\$ 81,125	\$11,603	\$ 92,728
C&T	\$ 30,000	\$30,255	\$ 60,255
TOTAL	\$308,125	\$76,913	\$385,038

* State is required to provide 50% match in C&T, 15% (by policy) for other programs.

Re-budgeting –There was no rebudgeting in FY12.

III. GENERAL GRANT ADMINISTRATION

A. Recommended Actions for Grants Office - None

IV. COMPLIANCE AND ENFORCEMENT

A. Grantee Reports

1. Pesticide Enforcement Outcome Measures

HDA reported on the three Office of Enforcement and Compliance Assurance (OECA) measures for pesticide enforcement (Appendix 1). Values reported were:

- a. Repeat violator: 8% of actionable inspections included entities receiving an action in the past three years.
- b. Verified compliance: 32% of actionable inspections resulted in verified compliance.
- c. Cost per actionable inspection: \$9,483.56 is the cost per actionable inspection.

Compared to FY11, there were slightly more repeat violators, but also a large increase in the percentage of inspections that resulted in verifiable compliance (up from 11% in FY11). In addition, the cost per actionable inspection decreased from \$19,357 to \$9,483.56.

2. Summary of 5700-33H reports – attached as Appendix 2.

3. Annual Summary of Inspections and Enforcement Actions

HDA exceeded the number of projected inspections (266 projected, 440 completed). The percentage of all reported inspections (440) that resulted in any enforcement action was 19%, up from 9% in FY11, with agricultural use inspections resulting in the highest percentage of actions of any inspection category (36%) followed by marketplace inspections (28%). Seventy warning letters were issued, and two cases were assessed fines in FY12, versus four in FY11. Eleven inspection files were referred to EPA for enforcement review and possible development in FY12, down from twenty-nine in FY11.

B. Case File and Enforcement Action Evaluation

1. Significant Cases (FIFRA Section 27)

There was one episode referred to HDA as a high level episode in FY12. However, upon further investigation, no link to pesticides was found, and the referral was cancelled. Each island maintains a separate list of all episodes and complaints received. These are recorded and reported to EPA.

2. Routine Inspections – other than Worker Protection

Forty five case files were reviewed. Inspection files were randomly selected from actionable and non-actionable inspections. Inspections selected represented the work of

five different inspectors. Inspections continue to document compliance/non compliance with pesticide laws, and in most cases include necessary evidence such as photographs, labels and invoices. HDA forwards any inspections conducted with a federal credential, or that reveal a federal violation, to EPA. There were no Special Requests issued to HDA during FY12. HDA did not complete any container/containment inspections, as there are no facilities currently identified in Hawaii that meet the necessary criteria. The Pesticide Container/Containment Inspection and Enforcement Accomplishment Report (EPA C/C Form 5700-33H) is included in Appendix 2.

1. Oversight inspections (non-WPS) - none

C. Compliance Priority – Worker Protection Standard (WPS)

1. Reports

a) The Pesticide Worker Protection Standard Inspection and Enforcement Accomplishment Report (WPS Form 5700-33H) is included in Appendix 2.

2. Significant WPS Cases (FIFRA Section 27) - none

3. WPS oversight inspections – none

4. WPS case file evaluation

HDA conducted forty one WPS Tier 1 inspections at establishments throughout Hawaii, twenty of which were for-cause. Out of the total number, one civil complaint and three warnings were issued. Inspection files were complete and contained required information. Four Tier 2 inspections were also conducted. Inspections were of high quality and included appropriate documentation.

5. Worker Protection Risk-Based Targeting Strategy

a) Implementation of Risk-Based Targeting Strategy

A WPS targeting strategy was developed in 1994. Targeting was based partly on how many restricted-use pesticides were purchased by growers, as well as how many workers were employed by the establishment. Since that time, agriculture has changed dramatically in Hawaii. The number of large farms with many workers has greatly decreased. Farms are smaller (average farm size is 150 acres) and growers buy smaller quantities of pesticides. Inspectors have found that they can identify establishments that fall under the WPS by conducting typical agricultural use inspections and asking questions related to worker activity during the inspection. They will then return at a later date to conduct a WPS inspection. Larger establishments are inspected approximately every two years.

D. Inspection and Enforcement Support

1. Training

At the time of the EPA visit in November, 2012, HDA conducted an annual pesticide training workshop for all HDA Pesticide Program staff (inspectors, education, and registration staff) and outer Pacific Island pesticide programs. The workshop reflected on the previous year's accomplishments and established priorities and goals for the coming year. Highlights included completion of standard operating procedures for the Branch, completion of the draft QAPP, and involvement of staff in an investigation into illegal pesticide use on basil. Special focus was directed at reviewing the workplan commitments agreed upon between HDA and EPA. The Program Manager stressed the need for staff to focus on repeat violators, making sure that monthly checks are done to identify those locations that require a follow-up visit to ensure compliance. Medical monitoring and respirator fit-testing were provided to inspectors.

At the time of the review, HDA had seven federally-credentialed inspectors. Training records were properly maintained at the Honolulu office, and inspectors had met the commitments outlined in the FIFRA inspector credential authorization agreement. HDA intends to hire an additional inspector to assist with coverage for Oahu, where there is currently only one inspector.

TRAINING	DATE
C&T Exam Development	Oct. 2011
C&T Exam Development	May 2012
WRPM –Cody, WY	May 2012
Intermediate Registration Evaluation Course - VA	July 2012
ASPCRO – Seattle, WA	Aug. 2012
Enforcement PIRT - NC	Sept. 2012
C&T PREP – Davis, CA	Sept. 2012

2. Enforcement Response Policy

The Hawaii Department of Agriculture revised and adopted its Pesticide Enforcement Action and Penalty Assessment Schedule on October 24th, 2006. Review of case files indicates that HDA follows its enforcement response policy. There are several areas where the policy is in need of updating; the Department of Agriculture is currently working to fill positions on the Governor's Pesticide Advisory Committee, which when fully formed, will take up the issue of revision of pesticide regulations in Hawaii.

3. Neutral Inspection Scheme

Applicators that are likely to use more RUPs are inspected more frequently than those that do not. This is based on amounts of RUPs purchased divided by the number of applicators employed by a business. With regard to marketplace inspections, they are conducted primarily based on complaints, rather than through a neutral inspection scheme. This has been discussed during previous reviews as an area for additional focus by HDA. HDA should consider whether these overall approaches to targeting inspections are still appropriate and effective.

4. Inspection and Enforcement Procedures

Discussions were held throughout the year between HI inspection staff and EPA as procedural issues arose. HDA is encouraged to continue to identify those areas that are lacking in the ERP, so that at a future date, changes can be made. HDA has revised the Branch Standard Operating Procedures, which includes neutral inspection procedures. HDA has one case development officer that reviews all files as they come in from the inspection staff. There is a vacant Planner position in the Branch; the Program Manager hopes to fill this vacancy and cross-train the employee on case development.

5. Quality Assurance

HDA staff worked consistently on a revised QAPP during FY12. At the time of this writing, the draft QAPP and associated laboratory documentation, including over 30 standard operating procedures had been submitted and was under review in the Regional Office. During FY12, a second chemist was hired to assist in the Chemical Analysis Laboratory.

6. Special activities/investigations

In cooperation with EPA, HDA is providing ongoing support to outer Pacific island pesticide program staff on import, inspection, enforcement, and certification issues. As in previous years, HDA extended an invitation to outer island inspectors to attend the Inspector Workshop. Attendance at the workshop provides an opportunity for the inspectors to receive medical monitoring exams and respirator fit tests, as well as to participate in discussions with fellow inspectors.

In FY12, it was discovered that several growers of sweet basil had been using a restricted use pesticide (RUP) not labeled for use on basil. This investigation ultimately led to nine different farms suspected of using this RUP. HDA completed thorough inspections at these farms, and is now in the process developing enforcement actions. It is likely that four entities will receive monetary penalties and five will receive warning letters.

E. New Legislation and Regulations

There was no new pesticide-related legislation proposed or passed in FY12.

F. Action Items from Previous Reviews

Recommendation 09-02: HDA should revise and update quality assurance documents in FY10. EPA is available to assist with any questions that HDA or the Chemical Analysis Laboratory may have in these revisions.

Status: HDA worked on the revised QAPP during FY12, and in November provided a draft for EPA review. This recommendation is now closed.

Recommendation 10-01: A narrative end of year report, covering all program areas and due 40 days after the end of the fiscal year should be prepared and forwarded to the Regional Office as soon as possible.

Status: Narratives were included with each quarterly report for FY12. Timely reporting is appreciated. This recommendation is now closed.

Recommendation 10-02: HDA should review their enforcement penalty policy and identify areas that need revision or update.

Status: This was discussed during the end of year review, and it appears that once the Pesticide Advisory Committee takes this issue up, there will be movement in this area. HDA understands where the penalty policy has weaknesses and/or is problematic, and plans to strengthen this and other parts of HI's pesticide rules.

Recommendation 10-03: HDA should develop a neutral scheme for conducting marketplace inspections. One approach would be to select an EPA priority area (such as products that make public health claims) to create a neutral inspection scheme.

Status: This recommendation remains in effect; HDA should review its targeting strategies to ensure that they are still effective.

G. Conclusions and Recommendations for Compliance/Enforcement

HDA continues to maintain a quality enforcement program. HDA continued to re-inspect numerous establishments to assess compliance with the WPS in FY12. HDA is encouraged to revisit and revise its enforcement response policy, and maintain its focus on WPS enforcement. Policies and documents in need of revision and update should be identified and a plan put in place to make the necessary changes. HDA has made progress in addressing the issue of inspection backlog, but the case development officer would benefit from assistance with initial review of inspection files. HDA is planning to address this by hiring a planner in the coming year.

V. PROGRAMS

A. Worker Safety – C&T

1. Previous Recommendations - none

2. Accomplishments

a) Work-Plan Commitments & National Program Priorities

HDA had 1696 certified commercial and private applicators at the end of FY12; numbers that have remained unchanged from FY11. HDA updated the State Certification & Training plan, administered exams, and reviewed 154 courses for continuing education units, compared to 210 the previous year. HDA also provided eight presentations to certified applicators during the course of the year, down from twenty-nine the year before. In FY12, assignment changes took place within the education program with the end result being that there is now three staff in the education program at HDA, up from two in FY11. They cover exam administration and consultative visits on Oahu, Maui and Lanai. The island of Hawaii is covered by another employee based in Hilo. Twenty-three courses were monitored by HDA in FY12. Certification reporting in CPARD was completed by HDA in a timely manner.

HDA's databases for certified applicators as well as for tracking continuing education units are cumbersome and not integrated. The program manager for the Education section has ideas for updating and integrating this system, and has consulted with colleagues from other states who have done so. HDA is encouraged to identify the necessary steps towards improving these systems, and to discuss this with EPA during negotiations for FY14.

HDA worked closely with the Cooperative Extension Service (CES), meeting at least twice per year with representatives from CES Pesticide Applicator Training Program, at the University of Hawaii. HDA also meets with the Hawaii Pest Control Board, which reviews and approves applications for new pest control businesses in the state. University personnel travel to each of the neighbor islands to prepare applicators for the certification exam on a yearly basis.

Certification cards issued in Hawaii currently have a photo ID and bar code. Annual C&T Plan Reports for Hawaii and other states are available at: <http://cpard.wsu.edu/>

3. PART Review Measures - none

4. State/Tribe Feedback - none

5. Conclusions and Recommendations

All negotiated outputs have been satisfactorily met for FY12. HDA should explore ways to integrate tracking systems for education and licensing. Ideas for a possible supplemental project for FY14 should be shared with EPA during upcoming negotiations.

B. Worker Safety - WPS

1. Previous Recommendations - none

2. Accomplishments

a) Work-Plan Commitments & National Program Priorities

HDA conducted 67 consultative visits, including 18 WPS-related visits that reached 144 people. Consultative visits are scheduled when a new applicator becomes certified, or, if an applicator has received a notice of warning. A visit may be made to ensure that the applicator has subsequently come into compliance. HDA is also responding to a recent increase in Chinese and Laotian immigrant farmers on Oahu by providing pesticide safety and WPS training at key locations. HDA also provided outreach using the updated How to Comply Manual to agricultural establishments. HDA meets several times per year with the University of Hawaii Cooperative Extension and the Pest Control Board of the Department of Commerce and Consumer Affairs to discuss training and WPS issues.

3. PART Review Measures - none

4. State/Tribe Feedback - none

5. Conclusions and Recommendations

All negotiated outputs have been satisfactorily met for FY12.

C. Water Quality

1. Previous Recommendations - none

2. Accomplishments

a) Work-Plan Commitments & National Program Priorities:

HDA continues to review new pesticide products for groundwater and surface water concerns. At the time of this writing, HDA had not yet updated the Pesticides of Interest Tracking System (POINTS) for FY12, so numbers remain the same from FY11. Specifically, HDA has evaluated 47 of 71 Pesticides of Interest (66%), is actively managing 15 of 16 Pesticides of Concern (POC; 94%) and is demonstrating progress for 9 of 15 actively managed POCs (60%). Hawaii continues to use modeling to determine whether new chemicals may have the potential to leach into groundwater. HDA continually reviews pesticide labels to ensure that they include necessary language for protection of ground and surface water. HDA has identified several labels, including rodenticides and termiticides that do not have appropriate water quality protection language. Restricted use pesticide sales records are monitored to identify products that may affect water quality. HDA has discussions with HI Department of Health (DOH) as well as registrants to discuss pesticides of concern for surface and ground water. The HI Department of Health is responsible for implementing the pesticides NPDES permit

program in Hawaii, and is currently working to revise Hawaii Administrative Rules to include these provisions.

3. PART Review Measures - none

4. State/Tribal Concerns - none

5. Conclusions and Recommendations

All negotiated outputs have been satisfactorily met for FY12.

D. Endangered Species

1. Previous Recommendations - none

2. Accomplishments

a) Work-Plan Commitments & National Program Priorities

HDA continues to consult and coordinate with other State agencies on Section 18 emergency exemption requests and special local needs registration applications. HDA assigned a staff person to work on endangered species activities during FY12.

3. PART Review Measures - none

4. State/Tribe Feedback – none

5. Conclusions and Recommendations

All negotiated outputs have been satisfactorily met for FY12.



Pesticide Enforcement Outcome Measure Reporting Form

Grantee Hawaii Department of Agriculture, Pesticides Branch

Fiscal Year 2012

Measure No. 1 - Repeat Violator

A. Total # of Regulated Entities Receiving Enforcement Actions	B. Total # of Entities Receiving Subsequent Enforcement Actions (i.e. subset of column A)	C. Repeat Violator Measure—B/A
75	6	0.08

Measure No. 2 - Complying Actions

D. Total # of Enforcement Actions Resulting in Verified Compliance: 24

E. Total # of Enforcement Actions (from form 5700-33H): 75

F. Complying Actions Measure—D/E: 0.32

Measure No. 3 - Efficiency

G. Grantee Pesticide Enforcement Funding: \$ 488,142.00

H. EPA Pesticide Enforcement Funding: \$ 223,125.00

Base Enforcement 167,000.00

Worker Protection 26,125.00

Enforcement Discretionary 30,000.00

Lab Equipment 0.00

I. Efficiency Measure—(G+H)/E: 9,483.56

APP2

FIFRA/TSCA TRACKING SYSTEM
 ENFORCEMENT ACTIONS RESULTING FROM INSPECTIONS
 REPORTING METHOD: STATE + COOPERATIVE ACTIVITY
 TOTALS FOR Hawaii (HI)

PROGRAM: GRANT1

PAGE: 1

FOR THE PERIOD - FROM: 10/01/2011
 TO: 09/30/2012

REPORT DATE: 10/30/12

LAST UPDATE: 10/30/12

ENFORCEMENT ACCOMPLISHMENTS	AGRICULTURE		NON-AGRICULTR		EXP	PRODUC MARKET		IMPORT	EXPORT	CERTIF	RESTRC	TOTAL
	USE	FOLLOW	USE	FOLLOW	USE	ESTABL	PLACE			APPLCR	USE PE	
		UP		UP	INSP					RECORD	ST DLR	
INSPECTIONS	122	49	87	42	1	3	32	5	0	88	11	440
FEDERAL FACILITIES	0	0	1	0	0	0	0	0	0	0	0	1
WORKER PROTECTION	0	0	0	0	0	0	0	0	0	0	0	0
GROUND WATER	0	0	0	0	0	0	0	0	0	0	0	0
ENDANGERED SPECIES	0	0	0	0	0	0	0	0	0	0	0	0
CANCELLATIONS/SUSPENSIONS	0	0	0	0	0	0	0	0	0	0	0	0
SAMPLES PHYSICAL	0	74	0	28	0	0	0	0	0	0	0	102
DOCUMENTARY	0	0	0	0	0	0	32	0	0	0	0	32
CIVIL ACTIONS	2	0	0	0	0	0	3	0	0	0	0	5
CRIMINAL ACTIONS	0	0	0	0	0	0	0	0	0	0	0	0
ADMINISTRATIVE HEARINGS	0	0	0	0	0	0	0	0	0	0	0	0
LIC./CERT. SUSPENSIONS	0	0	0	0	0	0	0	0	0	0	0	0
LIC./CERT. REVOCATIONS	0	0	0	0	0	0	0	0	0	0	0	0
LIC./CERT. COND OR MOD	0	0	0	0	0	0	0	0	0	0	0	0
WARNING LETTERS	42	6	10	11	0	0	1	0	0	0	0	70
STOP SALE, SEIZURE, ETC.	0	0	0	0	0	0	0	0	0	0	0	0
CASES FORWARDED TO EPA	0	0	3	0	0	3	5	0	0	0	0	11
OTHER ENFORCEMENT ACTIONS	0	0	0	0	0	0	0	0	0	0	0	0
=====												
TOTAL NUMBER OF												
ACTIONABLE INSPECTIONS-	44	6	13	11	0	3	9	0	0	0	0	86
PERCENT OF INSPECTIONS-												
RESULTING IN ACTIONS--	36.1	12.2	14.9	26.2	0.0	100.0	28.1	0.0	0.0	0.0	0.0	19.5
PERCENT OF TOTAL												
ACTIONS---	51.2	7.0	15.1	12.8	0.0	3.5	10.5	0.0	0.0	0.0	0.0	100.0
=====												
NUMBER OF CASES ASSESSED FINES	1	0	0	0	0	0	1	0	0	0	0	2
=====												

** NO DATA FOUND FOR QUARTER 1 **

** NO DATA FOUND FOR QUARTER 3 **

APP 2-22

United States Environmental Protection Agency Washington, DC 20460									
Pesticide Worker Protection Standard Inspection and Enforcement Accomplishment Report									
State	Hawaii	Fiscal Year	2012	Reporting Period	10/01/11-09/30/12		<input checked="" type="checkbox"/> Total Program Accomplishment		
Enforcement Accomplishments This Reporting Year		WPS Tier I Inspection		WPS Tier II Inspection		Total Inspections	*Inspections at Facilities Claiming Family Exemption	Violations during WPS Inspections	
		Use	For Cause	Use	For Cause			WPS Violation Categories	Number of Violations
Total Inspections Conducted		21	20	4	0	45	0		
WPS Enforcement Actions								1. Pesticide Safety Training	4
Civil Complaints Issued		1	0	0	0	1		2. Central Posting	3
Criminal Complaints Referred		0	0	0	0	0		3. Notice of Application	3
Administrative Hearings Conducted		0	0	0	0	0		4. Entry Restrictions	0
Licence/Certification Suspension		0	0	0	0	0		5. Personal Protective Equipment	0
Number of Warnings Issued		3	0	0	0	3		6. Mix/Loading, Application Equip & Applications	0
Stop-Sale, Use and Removal Order (SSURO)		0	0	0	0	0		7. Decontamination	2
Cases Forwarded to EPA for Action		0	0	0	0	0		8. Emergency Assistance	0
Other Enforcement Actions (e.g. Advisory Letters)		0	0	0	0	0		9. Information Exchange	0
Number of Cases Assessed Fines						0		10. Retaliation	0

EPA WPS Form 5700-33H

* This Column is a subset of the WPS Tier I and WPS Tier II Columns combined to collect data on inspections conducted at facilities claiming the Immediate Family Exemption.

APP 2 P 3



United States
ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

Pesticide Container/Containment Inspection and Enforcement Accomplishment Report

State/Tribe	Hawaii	Fiscal Year	Sep 30, 2012	Reporting Period	Fourth Quarter	<input type="checkbox"/> Total Program Accomplishments	<input type="checkbox"/> Workplan Activities Only
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Enforcement Accomplishments This Reporting Year	PEI with Containment	Non-PEI Containment	Total
Total Inspections Conducted	0	0	0
Samples Collected			
Physical	0	0	0
Documentary	0	0	0
Civil Complaints Issued	0	0	0
Criminal Complaints Referred	0	0	0
Administrative Hearings Conducted	0	0	0
Number of Warnings Issued	0	0	0
Stop-Sale, Use and Removal Order (SSURO)	0	0	0
Cases Forwarded to EPA for Action	0	0	0
Other Enforcement Actions (e.g. Advisory Letters)	0	0	0
Number of Cases Assessed Fines	0	0	0

Container/Containment Violations	
Refillable Containers	
1. Deficient labeling (i.e. cleaning and disposal instructions)	0
2. Deficient container design (valves, openings)	0
3. Producing establishment registration violations	0
4. No contract manufacturing agreement, residue removal instructions, list of acceptable containers	0
5. Deficient management procedures & operation	0
6. Record keeping	0
Containment	
7. Secondary containment & pads – capacity/design	0
8. Secondary containment & pads – site management	0
9. Secondary containment & pads – record keeping	0
Total Violations	0

Reset Form